

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JUAN RAMON TORRES and EUGENE
ROBISON,**

Plaintiffs,

v.

CIVIL ACTION NO. 4:09CV2056

**SGE MANAGEMENT, LLC; STREAM
GAS & ELECTRIC, LTD; STREAM SPE
GP, LLC; STREAM SPE, LTD; IGNITE
HOLDINGS, LTD. ; CHRIS DOMHOFF;
ROB SNYDER; PIERRE KOSHAKJI;
DOUGLAS WITT; STEVE FLORES;
MICHAEL TACKER; DONNY
ANDERSON; TREY DYER; STEVE
FISHER; RANDY HEDGE; BRIAN
LUCIA; LOGAN STOUT; AND
PRESLEY SWAGERTY,**

and

**SGE ENERGY MANAGEMENT, LTD.;
SGE IP HOLDCO, LLC; SGE GEORGIA
HOLDCO, LLC; SGE SERVICECO,
LLC; SGE CONSULTANTS, LLC;
STREAM GEORGIA GAS SPE, LLC;
STREAM TEXAS SERVICECO, LLC;
SGE IGNITE GP HOLDCO, LLC; SGE
TEXAS HOLDCO, LLC; SGE NORTH
AMERICA SERVICECO, LLC;
POINTHIGH PARTNERS, LP;
POINTHIGH MANAGEMENT
COMPANY, LLC; DARRYL SMITH;
SUSAN ANDERSON; MARK DEAN; LA
DOHN DEAN; A.E. "TREY" DYER, III;
SALLY KAY DYER; DYER ENERGY,
INC.; DIANE FISHER; KINGDOM
BROKERAGE, INC.; FISHER ENERGY,
LLC; SUSAN FISHER; MARK
FLOREZ; THE RANDY HEDGE
COMPANIES INC.; MURLLE, LLC;
ROBERT L. LEDBETTER; SUE
LEDBETTER; BETH LUCIA; GREG**

MCCORD; HEATHER MCCORD;	§
ROSE ENERGY GROUP, INC.;	§
TIMOTHY W. ROSE; SHANNON	§
ROSE; LHS, INC.; HALEY STOUT;	§
PROPERTY LINE MANAGEMENT,	§
LLC; PROPERTY LINE LP;	§
SWAGERTY MANAGEMENT, LLC;	§
SWAGERTY ENERGY, LTD;	§
SWAGERTY ENTERPRISES, LP;	§
SWAGERTY ENTERPRISES, INC.;	§
SWAGERTY, INC.; SWAGERTY	§
POWER, LTD.; JEANNIE E.	§
SWAGERTY; SACHE, INC.; TERRY	§
YANCY; and SHELBA YANCY,	§
	§
	§
Defendants.	§
	§

DEFENDANTS' RULE 26(a)(1) SUPPLEMENTAL INITIAL DISCLOSURES

TO: Plaintiffs Juan Ramon Torres and Eugene Robison, by and through their attorneys, Scott M. Clearman and Matthew J. M. Prebeg, The Clearman Law Firm PLLC, 815 Walker, Suite 1040, Houston, Texas 77002, and Jeffrey W. Burnett, 12226 Walraven, Houston, Texas 77336.

Defendants SGE Management, LLC, Stream Gas & Electric, Ltd., Stream SPE GP, LLC, Stream SPE, Ltd., Ignite Holdings, Ltd., Chris Domhoff, Rob Snyder, Pierre Koshakji, Douglas Witt, Steve Flores, Michael Tacker, Donny Anderson, Trey Dyer, Steve Fisher, Randy Hedge, Brian Lucia, Logan Stout, Presley Swagerty, PointHigh Management Company, LLC, PointHigh Partners, L.P., SGE Serviceco, LLC, now known as SGE Texas Serviceco, LLC, SGE Energy Management, Ltd., SGE Ignite GP Holdco, LLC, Stream Georgia Gas SPE, LLC, SGE North America Serviceco, LLC formerly known as SGE Georgia Holdco, LLC, SGE IP Holdco, LLC, SGE Texas Holdco, LLC, Terry Yancey, La Dohn Dean, Mark Dean, Diane Fisher, Darryl Smith, Beth Lucia, Greg McCord, Fisher Energy, LLC, Dyer Energy, Inc., Jeanie E. Swagerty, Heather McCord, Hayley Stout, incorrectly named as Haley Stout, LHS, Inc., Kingdom

Brokerage, Inc., Mark Florez, Property Line Management, LLC, Property Line, LP, Rose Energy Group, Inc., Robert L. Ledbetter, Shelba Yancey, Susan Anderson, Sue Ledbetter, The Randy Hedge Companies, Inc., Timothy Rose, Susan Fisher, Swagerty Enterprises, LP, Swagerty Energy, Ltd., Swagerty, Inc., Swagerty Power, Ltd., Swagerty Management, LLC, Swagerty Enterprises, Inc., Sally Kay Dyer and Paul Thies (collectively the “Defendants”), by and through their attorneys of record hereby submit their Supplemental Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

SUPPLEMENTAL INITIAL DISCLOSURES

- (a) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE:

1. SGE Management, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs’ claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

2. Stream Gas & Electric, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs’ claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

3. Stream SPE GP, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

4. Stream SPE, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

5. Ignite Holdings, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants. This party also has information regarding Plaintiffs' Independent Associate positions with Ignite.

6. Chris Domhoff
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information Mr. Domhoff will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim.

However, Mr. Domhoff may have information regarding the structure, ownership, affiliations or business practices of the entity Defendants as well as the roles of the individual Defendants.

7. Rob Snyder
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information Mr. Snyder will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, Mr. Snyder may have information regarding the structure, ownership, affiliations or business practices of the entity Defendants as well as the roles of the individual Defendants.

8. Pierre Koshakji
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information Mr. Koshakji will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, Mr. Domhoff may have information regarding the structure, ownership, affiliations or business practices of the entity Defendants as well as the roles of the individual Defendants.

9. Douglas Witt
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Witt has knowledge regarding the Ignite business and his role related thereto.

10. Steve Flores
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Flores has knowledge regarding the Ignite business and his role related thereto.

11. Michael Tacker
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Tacker has knowledge regarding the Ignite business and his role related thereto.

12. Donny Anderson
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Anderson has knowledge regarding his position as an Ignite Associate.

13. Trey Dyer
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Dyer has knowledge regarding his position as an Ignite Associate.

14. Steve Fisher
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Fisher has knowledge regarding his position as an Ignite Associate.

15. Randy Hedge
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Hedge has knowledge regarding his position as an Ignite Associate.

16. Brian Lucia
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Lucia has knowledge regarding his position as an Ignite Associate.

17. Logan Stout
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Stout has knowledge regarding his position as an Ignite Associate.

18. Presley Swagerty
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Swagerty has knowledge regarding his position as an Ignite Associate.

19. PointHigh Management Company, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

20. PointHigh Partners, L.P.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

21. SGE Serviceco, LLC
now known as SGE Texas Serviceco, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

22. SGE Energy Management, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim.

However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

23. SGE Ignite GP Holdco, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

24. Stream Georgia Gas SPE, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

25. SGE North America Serviceco, LLC
formerly known as SGE Georgia Holdco, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

26. SGE IP Holdco, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

27. SGE Texas Holdco, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

28. Terry Yancey
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Yancey has knowledge regarding his association with Stream Gas & Electric, Ltd. and Ignite Holdings, Ltd.

29. La Dohn Dean
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Dean has knowledge regarding her position as an Ignite Associate.

30. Mark Dean
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Dean has knowledge regarding his position as an Ignite Associate.

31. Diane Fisher
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Fisher has knowledge regarding her position as an Ignite Associate.

32. Darryl Smith
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Smith has knowledge regarding the Ignite business and his role related thereto.

33. Beth Lucia
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Lucia has limited knowledge regarding Brian Lucia's position as an Ignite Associate.

34. Greg McCord
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. McCord has knowledge regarding his position as an Ignite Associate.

35. Fisher Energy, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

36. Dyer Energy, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

37. Jeanie E. Swagerty
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Swagerty has knowledge regarding her position as an Ignite Associate.

38. Heather McCord
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. McCord has knowledge regarding her position as an Ignite Associate.

39. Hayley Stout
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Stout has limited knowledge regarding Logan Stout's position as an Ignite Associate.

40. LHS, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

41. Kingdom Brokerage, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

42. Mark Florez
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Florez has knowledge regarding his position as an Ignite Associate.

43. Property Line Management, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

44. Property Line LP
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

45. Rose Energy Group, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

46. Robert L. Ledbetter
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Ledbetter has knowledge regarding his position as an Ignite Associate.

47. Shelba Yancey
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Yancey has knowledge regarding her position as an Ignite Associate.

48. Susan Anderson
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Anderson has knowledge regarding her position as an Ignite Associate.

49. Sue Ledbetter
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Ledbetter has limited knowledge regarding Robert Ledbetter's position as an Ignite Associate.

50. The Randy Hedge Companies, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim.

However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

51. Timothy Rose
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Rose has knowledge regarding his position as an Ignite Associate.

52. Susan Fisher
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Fisher has knowledge regarding her position as an Ignite Associate.

53. Swagerty Enterprises, LP
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

54. Swagerty Energy, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim.

However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

55. Swagerty, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

56. Swagerty Power, Ltd.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

57. Swagerty Management, LLC
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

58. Swagerty Enterprises, Inc.
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. However, this party has information regarding its structure, ownership, affiliations, business practices and relation, if any, to the other Defendants.

59. Sally Kay Dyer
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Ms. Dyer has limited knowledge regarding Trey Dyer's position as an Ignite Associate.

60. Paul Thies
c/o Michael K. Hurst
Dena DeNooyer Stroh
Gruber Hurst Johansen Hail Shank, LLP
1445 Ross Avenue, Suite 2500
Dallas, Texas 75202-2711

It is not clear at this time what information this party will have regarding Plaintiffs' claim because Defendants do not believe there is a basis for such claim. Mr. Thies has limited knowledge regarding the Ignite business.

61. Juan Ramon Torres
c/o Scott M. Clearman
Brian D. Walsh
The Clearman Law Firm PLLC
815 Walker, Suite 1040
Houston, Texas 77002

Has knowledge regarding his claims and allegations.

62. Eugene Robison
c/o Scott M. Clearman
Brian D. Walsh
The Clearman Law Firm PLLC
815 Walker, Suite 1040
Houston, Texas 77002

Has knowledge regarding his claims and allegations.

63. Any individuals identified in the disclosures of other parties to this lawsuit.

Discovery has only just begun in this matter. Defendants will reasonably supplement these disclosures.

(b) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE:

1. Records regarding Plaintiffs' Independent Associate positions with Ignite Holdings, Ltd. ("Ignite").
2. Applicable versions of Ignite's Policies and Procedures.
3. Ignite Income Disclosure.
4. Ignite Compensation Plan.
5. Ignite Independent Associate Terms & Conditions.
6. Entity structure chart.
7. Training and marketing materials of Ignite.

All documents described above are in the custody and control of Ignite.

Discovery has only just begun in this matter. Defendants will reasonably supplement these disclosures.

Defendants anticipate certain documents in this matter will be confidential or for attorneys' eyes only and believe an agreed protective order will need to be entered in this matter.

(c) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

RESPONSE:

Defendants have not claimed any damages at this time.

(d) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

None at this time.

Respectfully submitted,

GRUBER HURST JOHANSEN HAIL SHANK, LLP

By: /s/ Dena DeNooyer Stroh

MICHAEL K. HURST, LEAD ATTORNEY

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Southern District No. 567951

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been served upon counsel for Plaintiffs, Scott M. Clearman, Matthew J. M. Prebeg, and Jeffrey W. Burnett, via the Court's electronic filing system on this 15th day of December, 2011.

/s/ Dena DeNooyer Stroh

Dena DeNooyer Stroh